

EXHIBIT J



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May 22, 2012

BY EMAIL

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OUR FILE NUMBER
027559-00231

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**Re: *In re High-Tech Employee Antitrust Litigation*
Master Docket No. 11-cv-2509-LHK (N.D. Cal.)**

Dear Dan:

I write in response to your letter of May 15, 2012, regarding data produced by Apple Inc. in the above-captioned matter. As you know, Apple produced employee-level personnel data, including compensation data, from its Merlin HR database on May 3, 2012 (*see* files numbered 231APPLE004236 through 231APPLE004239). Apple also produced data regarding employee stock options from its third-party Equity Edge database, along with recruiting and candidate-level data from its third-party Virtual Edge database, on May 9, 2012 (*see* files numbered 231APPLE006199 through 231APPLE006205). Gathering this data, getting it ready for production, and resolving the related employee privacy issues was a significant undertaking, and we and Apple personnel worked hard to meet the Court's deadline. With the May 9 productions, Apple's production of data was complete.

As we agreed with Dean Harvey prior to Apple's data production, the employee-level personnel data from the Merlin HR database was produced on a quarterly basis for all employees (231APPLE004236), with a separate set of data produced for employees whose employment was voluntarily or involuntarily terminated (231APPLE004237).

We are looking into the specific questions regarding the data fields and data values that you attached to your letter and will provide a written response as soon as possible. Given the specific nature of your questions, we believe that a letter will be more efficient than having a teleconference or a 30(b)(6) deposition.

† In association with Tumbuan & Partners

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Daniel Walker, May 22, 2012 - Page 2

Please feel free to contact us with any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Christina Brown', with a stylized, flowing script.

Christina Brown
for O'MELVENY & MYERS LLP

cc: Dean Harvey